

ORIGINAL

January 9, 2021

Dear Honorable Judge Leslie Kobayashi,

I am writing this letter to ask your reconsideration of my case CIV. No. 18-00312 LEK-KJM on these stated items listed below and to correct clear errors to prevent manifest injustice. It is manifest injustice to not take in account that all parties that made accusations were proven untruthful.

1. The CBP did not have any paperwork or my name associated with any paperwork coming on the aircraft without being cleared.
2. Delta airlines had no paperwork that I was not doing a good job as a new mechanic. Delta airlines sent me over to Maui, OGG Airport for at least four days a month, for fourteen months, to work a split shift all by myself and take care of maintenance issues for two Boeing 757's each day.
3. Delta airlines had no proof I ever took food off of an aircraft or ate food in the aircraft. Don Kim admitted he did not see me do this in his deposition, as did Sandy Naito in her deposition. I was fired because of the made up lies by Steve Villicana, who then received the lead position and is now a manager for Delta Airlines for producing this document.

Referring to your "Order Granting Defendant's Motion For Summary Judgement", these are the points that are not truthful and I respectfully ask for your reconsideration.

Page 2, Plaintiff bid on an open position in Honolulu for an aircraft mechanic position on the "international line".

The above statement is misleading and false. I worked as an intern for Delta Airlines in Atlanta, GA from June 8, 2008 through April 1, 2009. On April 1, 2009 I started as an assistant mechanic with Delta Airlines in the Tech Ops hanger at Hartsfield-Jackson Airport in Atlanta, GA. It was during the time period from April 1, 2009 to June 30, 2009 that I made numerous bids on aircraft mechanic positions in both OGG, Kahului Airport on Maui and HNL, Honolulu Airport, on Oahu. During the beginning of June 2009, I found out that Delta had hired 4 men under my seniority for the positions open in HNL. It was then that I wrote a letter to Tony Charaf, President of Delta Tech Ops, asking Delta since I had higher seniority to consider my bid. Tony, myself and my son Michael met after he granted this request. Please see attached letter. It was on August 1, 2009 that I was granted the position in HNL as an aircraft mechanic. However, since I was a very new mechanic and had not worked nor was familiar with the Boeing 757 nor the Boeing 767 which was flown out of HNL. My new manager, Paul Fugere, asked if I could please stay in Atlanta to take both the month-long Boeing 757 and 767 classes. He also had me transferred from the Tech Ops hanger to the E gates where the "international line" mechanics work, so I could become familiar with these aircraft. I worked in Atlanta and went to school from August 1, 2009 to December 24th, 2009. There were no issues during this time in Atlanta. I worked this line with all the male mechanics in Atlanta as the only woman mechanic. There were many challenges, but working with these mechanics, I felt no discrimination, harassment nor did I experience a hostile work environment.

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Please see, Page 3, It was in my September 2009, Boeing 767 class that I met Timothy Donohue and introduced myself. Timothy Donohue had been working on the Boeing 767 for approximately 20 years before Delta sent him to school in Atlanta to get qualified to sign off on this aircraft. The first time I met Timothy in the classroom, he was angry and asked me if I knew what kind of commotion, I was causing in the HNL station. When I replied "No". He went on to tell me, among other items, that they had to build me a bathroom, and a really good mechanic was losing his job because of me, this was causing dissention among the mechanics in HNL. This was highly upsetting to me and I responded by asking him if he knew why I bid on the HNL line. He said no. I told him I had a son with cerebral palsy that could not live alone and wanted to go to college for Marine Biology in Hawaii and work with dolphins. I then was so upset by this encounter with a new co-worker that I wrote an email to Paul Fugere, station manager explaining this encounter and expressing my hesitation in causing all of this trouble. This email should have been provided by Delta Airlines with their documents. When I was terminated, Delta staff broke my 3 locks on my lockers, in the women's bathroom and disposed of 3 large binders, I kept there without even asking or letting me clean them out myself. Locks were on the lockers, because they had been previously tampered with by the male mechanics, when I was not working. These binders not only contained work I had accomplished in Atlanta, but personal papers along with the Pratt and Whitney 4000 engine manuals. I received these from Pratt & Whitney when I took classes at Pratt & Whitney in Hartford, CT on a Women In Aviation scholarship award. If Delta had fairly let me clean out my own lockers, I would have had the copy of the email I wrote expressing grave concern in transferring to HNL that I sent to Paul Fugere.

Please continue on page 3 to the statement concerning the multiple mechanics made to me when I first came to HNL, about how women did not belong in line maintenance. While this was stated numerous times to me, I did not approach Paul Fugere about this statement because I wanted to work my hardest to prove to him that he was wrong. I knew as the first woman working in HNL, I would be tested and challenged, so I wanted to work my hardest and learn as much as I could. I have worked in aviation since I was young, not only was my father a pilot, but I started flying when I was 18 years old. I earned my Privates Pilots license, and my Multi-Engine Land rating. During this time, I met many men that didn't want women to fly but didn't think women could. After some mechanical issues with the aircraft at the university I attended, I really wanted to change majors and become an aircraft mechanic. It was not until I was older when my son expressed his desire to work with dolphins that I actually went back to school, finished my education and got my Aircraft and Powerplant mechanics licenses.

Please see page 4. Plaintiff also stated that one summer... This was my first summer in HNL, five months after starting. I had worked in Atlanta previously and as a new mechanic had a limited number of short sleeve shirts. Also, Delta was backordered for these shirts and when I ordered them in April they had not come in by June. I had to wash my shirt each day and showered each day. It was extremely embarrassing to have my new manager state this. Especially since all of the male mechanics I worked with sweated and had odor from the Hawaiian heat.

In regards to Resil Lasam, "stating that I did not officially belong to us". This man I only met briefly twice, considering he was not my direct supervisor in Atlanta. I never had one complaint about me working in Atlanta. It is also very insulting to have a manager in HNL that stated he wishes I did not belong to him, when I was trying to learn as much as I could about my job. The other mechanics, I worked with in Atlanta told me it takes a good five years for everyone to even feel confident about fixing aircraft.

Going further on page 4, when I first met Jack he not only told me I was doing a great job in HNL, but that he could help me become a lead and possibly take over Curtis's job. When he came to HNL we even met for drinks. Though he falsely stated in his deposition that he went out with my "kids and I". So, if management saw leadership potential in my work ethic, why would there be an issue with my work performance that I was never aware of?

I attended school for the Boeing 747 ahead of other men at the station with more 747 experience. I was supposed to go in March of 2012, yet Curtis asked if I would switch months with Yon Ho Kim who had years more seniority than I did. Yon Ho never did go in March, nor has he gone as of 2019. You have to ask yourself, if I was doing so poorly in my position as an aircraft mechanic, why would they send me to learn how to fix another type of aircraft? Was this to set me up for failure, since I had very limited experience on the 747? Again, I did what I was asked to do and did not refuse to learn more about my job, like Yon Ho Kim did. This shows that Delta treated their male mechanics much different on a daily basis. Steve Villicana also pressed me to go to Boeing 747 school because Delta needed more mechanics qualified on this aircraft now that Korean was now flying the 747 into Hawaii. There were numerous other Delta male mechanics that were qualified to work a Delta 747; however, they were not forced to work the Korean contract because they simply stated they did not want to work it. This was alright with our managers, yet was not alright for a female aircraft mechanic to ask to not work the Korean contract because of their known discrimination to women.

Please see page 5. In August of 2010, I was not aware that Justin even complained about me until receiving paperwork from Delta 2 years ago. I do not even remember this instance. But do remember writing Paul about Justin.

Regarding the toilet issue, no other male mechanic was ever told to fix some item on another mechanics assigned plane. Ever. We would help each other out when it got busy on another mechanics plane, but never would one male mechanic stay in the office doing chemistry homework while another female mechanic was fixing a plane and the other male mechanic assigned to that plane left for home. It is a total lie that each plane is everybody's plane. The reason he wrote the letter stating that he was trying to help me learn was only because everyone knew he was wrong by telling me to do this. He was my co-worker and had been talked to about documented previous harassment, this is not his job to bully me, the only female, into doing his job. He was also never, ever up in the plane hiding to watch me. I was not in the bathroom the entire time and I was also talking to a cleaner up there, he never did come back after finally getting me the required paperwork I wanted to get myself before going up there. At the start of the job, Justin yelled at me to go fix it, without the paperwork. He was bigger and taller than me and I did not speak up because as I explained to Lisa, I was scared. Lisa Todd knew all of this and when we were riding on the bus in Portland together, she brought up that "wasn't I glad that I had won against Justin". I was very surprised at her comment, because no one had ever told me this. She told me she was very glad it had worked out for me. However, this can not be proven until Justin's records are examined. What was Delta so afraid of if Justin was in the right? After this incident, Justin Keller was not allowed to be TIC, technician in charge again. However, this is not in Lisa Todd's statement.

On page 7, Lisa Todd said I had made multiple reports to her about being harassed, however I only made two complaints to her. One for the January 2011, toilet incident and another for the December 2012, door incident. Where is the paperwork for these complaints, I supposedly made to her? Where did Delta have all of these investigations recorded? Again, stated falsely on page 11 that I came to her

numerous times and numerous investigations happened from HR. After Paul retired and Curtis came I spoke with him or Mike Coleman about harassment issues.

On page 11, it stated I requested not be assigned to work with Keller and Carter denied this request. This is not true. When Curtis came to our station in June of 2011, I was finally allowed to bid another shift so I bid day shift to get away from Justin. Paul Fugere up to this time would not allow me to switch shifts, even though I had the seniority to do so.

On page 13 it states that my vehicle tag was not in the proper place. However, when I went to the CRP I showed a picture of my red tag hanging off the rear view mirror. This is the placement stated on the parking permit. I took this picture at the tow lot before I was allowed in the vehicle. The person that had my car towed, never even looked in the side windows. They also did not tow any other vehicles that day, and there were at least 7 vehicles completely covered by car blankets that were tied down.

Page 14 has numerous false statements. When looking at Sandys statement, about the purser I explained this to Jack LaPalm in the interview on February 14, 2013 and to Steve Villicana when it happened. The incident was that KAL had called me up into the aircraft, close to the time they were boarding and showed me that a bulkhead seat IFE (In Flight entertainment) was not standing upright. We are not trained on these and how to fix is just tribal knowledge among mechanics. I tried to fix it the way I knew, however it needed to be taken apart. Since I was the only mechanic on the KAL 747 that day, I walked down and over to where another Delta mechanic, James was on the KAL Airbus 330 and asked him about his knowledge on how to fix the problem. He told me in detail, and to not let the cable drop, it would break when taking the seat apart. I then went back up to the 747 and proceeded to do exactly what James told me to do. However, this purser leaned down and was trying to tell me to fix it another way. I told him firmly to not interfere. Again, since Korean airlines does not have women mechanics this was not welcome. Previously, Lisa Todd had told me that I had to be more assertive, this is what I was professionally doing in this instance. The only other two instances I had with Korean Airlines I reported to Steve Villicana who was the coordinator for DAL mechanics and KAL operations. Steve told me not to worry, Korean was difficult to work with.

We all knew Korean was difficult to work with, that is why Curtis said he could not take me off the contract. The male mechanics did not want to work on that contract and were not pressured to do so. One mechanic told me after Korean made these allegations that he was very sorry he was not there to protect me. Delta should never have allowed male mechanics to keep their jobs after having major issues with Korean and then get off by not having to work with them. Korean airline was so difficult to work for that Delta did not continue the contract with Deltas ticket and gate agents that worked the contract for Korean airlines. None of the ticket agents wanted to work for them and it was getting harder and harder to find ticket and gate agents to work the Korean contract. Delta was well aware that Korean airlines was difficult to work with and should have never forced me as the lone female mechanic to work this contract.

On page 15, none of these instances happened. It is proven by the subpoena submitted by Customs and Border patrol. Your honor, I think it would help if I explained my job and its time limits. The aircraft would come in. I hook up to a headset and microphone in the nosewheel compartment and ask the pilot if there are any write ups or problems. He tells me any issues and then I start my walk around of the aircraft. I examine every part of the plane on the outside, including the cargo areas and check the engine oils, with a ladder. This takes a minimum of half an hour to a max of an hour on a Boeing 747. I

then go up to the cockpit to look at the logbook. By this time the cleaners have started cleaning and maybe Don Kim is in the aircraft for Korean airlines. Sometimes Sandy Naito would be there as oversite and maybe once a month, one of the station managers Mr. Woo or Dustin. These were the only KAL personnel I was familiar with. So, when Don Kim states in meetings he would hear things about me, I am not sure who he means and he stated he never remembered names. Ticket agents would be working at the ticket counter and gate agents were outside the aircraft by the gate. It would be rare to see the inbound flight attendants or pilots because they have to go through customs with the passengers.

Regarding the complaints brought against me by Don Kim, Sandy Naito and Steve Villicana, I am very surprised that the falseness of these claims is not more important to my termination and subsequent lawsuit. On page 17 it states, Plaintiff was present at Kim's deposition, and she states that, after it was over, "Kim approached (her) and apologized for what he had done to her". When Don Kim left, and made this statement, all of my lawyers, including Delta's lawyer, Richard Rand were still in the room. This is a misleading statement because it sounds like I was the only one that heard him apologize.

Please see the last paragraph on page 17, where it states that the parties agree, that Villicana reported. In the statement that Steve Villicana made that led to my termination he lied about telling me numerous times not to enter the aircraft until it was cleared, because the CBP did not have any record of these unlawful entries. Also I worked Delta international planes, knew the rules and was never written up. He also lied about me arguing with the flight attendants daily, these flight attendants rarely spoke the English language and I stated the only two issues I had with Korean airlines personnel, in my statements to Delta. This would also have been unprofessional. Steve also lied about not working with me in the past 6 months, he actually worked with me 28 times according to my paperwork. So, if this man who not only received the lead position from Jack LaPalm and then the manager position at HNL, lied about these three things, why would my taking food off the aircraft be any different? Don Kim admitted he lied, but then said he heard things, yet couldn't name who he heard them from. The Korean Airlines staff in Honolulu is very limited, maybe 5 people total, including Don Kim, Sandy Naito, the two managers Mr. Wo and Mr. Harry and a new employee named Ron. How could either of them not know who brought these issues up? Sandy Naito in her deposition stated repeatedly that she didn't know. None of these statements are even signed and the dates are questionable. My statement was taken on February 14, 2013 yet it says February 15th, 2013, how can we know for sure any of these are correct? Even in Curtis's first letter before my resignation, he stated he had never heard of a problem with me and Korean Airlines. I not only worked their contract, but also helped Curtis and Delta out by flying to Kahului Airport, on my days off and provided shift relief to the mechanic there for 14 months, four to eight days a month, by working 2 Boeing 757 aircraft by myself. Curtis even asked me to fly from Denver, CO before a leadership conference was over to work in Maui because no one else would fly from HNL to do the shift relief.

Please see on Page 19, Plaintiff argues her employment history and personnel file "contained nothing". If I was not disciplined for any infractions during the three years in Honolulu, why was I fired without Delta following their own rules for employee termination, yet Justin a male mechanic has been coached and disciplined numerous times, but not fired. Delta produced documents that showed he was disciplined along with Jeff White. Curtis Carter and Steve Villicana also stated that Justin was disciplined more than once.

Please see page 21 where Lisa Todd said that in November 2010, I came to her and told her I removed food items from the aircraft and I said my supervisor expressed concerns and instructed me to stop. This is untrue because I had never met Lisa Todd before January 2011 when I reported to HR that Justin Keller made me change a toilet on his aircraft while he did chemistry homework in the office. After this meeting about Justin I did not see Lisa Todd until she came with our new regional manager, Mike Coleman in October of 2011 to Honolulu. It was during this visit that Lisa Todd complained to Curtis that I was charging my radio on the top of the bathroom sink, which was a safety issue and that there were clothes on the floor. When Lisa Todd came into the women's bathroom that day I was in the shower and my work clothes were on the floor outside of the shower. I was the only woman at the station and the only one using that restroom. Curtis brought this up that next day and I explained what occurred. He asked me to put the radio elsewhere, so I brought in my own small table and put it next to the sink. By the sink was the only place a plug was. I again did not see Lisa Todd who was stationed in Minneapolis until the Portland trip in 2012. If this was a true statement by Lisa Todd why did she not bring it up during the investigation in February of 2013? Specifically, during training in Atlanta we were told that we were not allowed to take items off an aircraft. They stated in the class that a mechanic had been fired for taking a roll of toilet paper. This has always stuck in my mind and kept me from ever, ever taking anything.

Please see page 23 where LaPalm concluded that Plaintiff lied during the investigation. I truthfully answered all questions he and Lisa asked me on February 14th, 2013. At the end of the meeting, unprompted, Jack looked across the table and said, "I believe her Lisa, what about you"? Then Lisa on the conference speaker, said, "Yes I do too".

Please see page 24, where Lisa Todd admitted that in her investigation summary, she shortened expanded descriptions from Curtis. However, she actually changed them. I have also written about those incidents and the dates on them do not coincided with all of my daily note sheets. *Please see attachment A.*

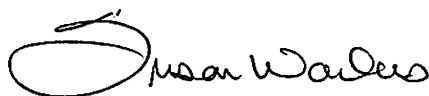
Please see on page 25 where the CRP is discussed. In Jack LaPalms deposition, Page 249: lines 1-8, he states, "Technically it should have stopped right then. Then they have 120 days to try to get the case on the books. They try. Its---there's flex there. Hers went much longer. In fact, Steve and I flew there one time to do the case. Once we landed in Atlanta, Susan had backed out, so we had to reschedule again. So this went on for a year and a half, which was unheard of". This is actually what happened with the CRP. At first after I was terminated Delta told Curtis that I couldn't do the CRP, then Curtis said I could. No one gave me any information on how to do this process. Until I read this from Jack's deposition, the only thing I was told is the whole process would take 3-4 months. No one ever told me I had only 30 days to file. I had to wait for them to send me the paperwork from the council. They kept putting off my case because the man in charge, Ed Brown, said they had too many backlogged cases. I would have been waiting until today if I had not emailed Tony Charaf, President of Delta Tech Ops and explained the situation to him. *Please see attachment B.* Right away Ed Brown called me and they came in to Honolulu, June of 2014 with the documents. These were the documents concerning my termination. I had never seen them before this date. I had so much time to prepare, but again they told me that they had back logged cases ahead of me. By the end of the year, there was a new person in charge of the CRP, Becky Camp. She asked if I could come in January of 2015, but I could not because my son Michael was in a private class (his boat Captains class) that we had paid for, and he needed me to help him write notes in each class. She gave me a date in February and that is when I went, February 17, 2015. Two

years after my termination. After the CRP, the lady in charge Becky Camp told me that I should have gotten up and yelled at Steve for making this stuff up. But at that time, I had not gotten sleep for over 24 hours. Delta would not allow me to come in a day early and get needed rest after flying a red eye to Atlanta from Honolulu. I would have stayed with friends. So it did not cost Delta anything to have me come in a day earlier. All the papers that they had given me, plus a binder I had put the papers in with detailed notes along with post it notes, were taken from me after the CRP. I was told it would go to a person higher up in management and they would be looking at everything to review. I left these documents because I wanted to include as much documentation as I could to show them that this termination was wrong.

Each and every day I worked for Delta airlines in Honolulu some kind of discrimination or harassment was perpetrated upon me. Whether it was Justin going on my computer while I was discussing something with the lead, Justin going into the female's bathroom and locker room or being put on an aircraft alone to do the job that two male mechanics were usually assigned. Each and every day I had issues with an established all-male staff that was allowed to harass, intimidate, yell and bully me.

I have worked as the lone woman on many, many jobs, but the way Delta allowed these men to act this way is reprehensible. These instances are happening with the women mechanics all over the Delta system. I have been the one woman that stood up to Delta and brought this to you, the law. I have fought for eight years to bring all this information justice and for all women mechanics to see equality within a position we love with all our hearts. I have wanted to be an aircraft mechanic since I was 18 years old and would have never acted in anything but a professional manner with not only Delta Airlines but Korean Airlines. Please accept this letter Judge Kobayashi and re-consider your decision.

Thank you for taking the time to read this request.

A handwritten signature in black ink, appearing to read "Susan Wadas". The signature is fluid and cursive, with a large, stylized initial "S" that loops around the first part of the name.

Susan Wadas
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Summary of Accusations

Was not given these written accusations of my termination until June of 2014.

This was only after I had written the President of Delta Tech Ops, Tony Charaf and asked for help. Received these allegations from Ed Brown. Met him at the airport hotel in the lobby.

Exhibit 2: Sandy Naito of Korean Airlines, reported I engaged in an argument with a KAL purser. This was regarding the IFE system. I have this documented in my notes and even told Steve about this when it happened. He told me not to worry about it that Korean Airlines had made it clear on their checklist that the airline did not want us to turn off the IFE system on the 747. The only other complaint I received from KAL was when, in Fall of 2012, Sandy had told Steve that I was reading when waiting for the aircraft to get fueled. Steve asked me to move under the overhang so I would not be seen. Was never asked to stop reading. All of the other guys read the newspaper, played games on their IPADS and red books while waiting for the fueling to be completed. Sandy never complained about them. They did these things in site of the passengers waiting in the gate.

06/22/11: Sunday. Not sure what this was or how I could have been coached on conduct since I am off on Sunday/Monday. Not sure if Curtis was even working at the Honolulu Station yet.

8/03/2011: Wednesday. Not sure what this date is. My car was towed out of the Delta lot in May of 2011. It was the first day Curtis was working. I had not even met the man until he took me to get my car. I did not have the cash on me and he loaned me cash so I could get my car out of the tow lot. The Delta employee that was looking at cars to get them towed did not look under my new sunscreen, (shown in picture, red tag hanging down) to see the tag. Delta ops employees did not look up my license plate number, it was written down on my parking permit. I had to pay the \$142.00 out of my own money, to recover my car that was towed while I was working. Never coached on this, where is the documentation?

October 6, 2011: Thursday : Coached on Job Performance cleanliness of work area. The only thing I could think of was Curtis told me after Lisa Todd came to visit our office that my flashlight should not be on the side of the sink, charging. Said it was a safety issue. There are two sinks in my bathroom, I am the only female, so I had it on the second sink that I was not using. So I brought in a table and put it there to charge. (See digital picture of Bathroom on drive) Lisa Todd was visiting our station in October (not sure of the date) and I had not seen her since January, so I forgot her name. She was upset. Also told Curtis I had clothes on the floor in my bathroom. When she came into my bathroom I was taking a shower, no curtain on the shower. A person can see with the mirrors above the sink into the shower, so soaking wet (no clothing on) I hid in a corner until she left. The clothes she complained about was my uniform on the floor that I had taken off and left while taking a shower. My locker is on the other side of the bathroom, so I cannot take off my uniform there, because I would have to walk without clothes on past the door that could be opened at any time. I explained all of this to Curtis when he told me what Lisa said. Took him into my bathroom and he had suggested the table. Not exactly sure how I could have made this any better at the time, nor why she would report to my boss such a minor thing. How does this reflect on my job performance?

October 7, 2011: Friday: Steve Villacana TIC. Coached on Job Performance Failure to sign fuel slips. Not sure what this was about, never was spoken to about this. Always helped Steve by filling the Korean hard aluminum storage clipboard case for each Korean aircraft with fresh fuel slips and checklists. The fuel slips for Korean Aircraft are signed by the fueller only. Mechanics only take the fuel slips up to the pilot, so the fueller can finish up his job.

November 11, 2011: Friday: Coached on Conduct: Argument with leader about computer use. Not sure what this was about. Why would there be an argument about computer use. (documentation?)

March 29, 2012: Thursday: Coached on Conduct Argument with ACS about ID50 travel. Not sure what this was about. About this time I had gone up to one of the ACS agents, Sheri Freeman-Garza that I had spoken with before and she gave me

a sheet with instructions on how to do ID 50 travel with Hawaiian airlines on the internet. I was working for Delta in Maui, two or three times a month and in talking one time she had told me about ID50 travel when airline personnel are traveling for business purposes. I looked into this on my own personal time, to get a discount on flights for Delta, so they would not have to pay so much for the mechanics flights when they went to Maui. One mechanic from our Honolulu station went every Sunday and Monday for the one mechanic on Maui to have his days off.

June 28, 2012: Thursday: Coached on Attendance, Denied Eyewitness report on late arrival to work. No documentation on this. The only day I was late to work ever in three years (it wasn't on this day, it was November 6, 2012, nor was I ever coached on attendance) was when I went into work over a half hour early to speak with the Environmental manager for the ramp. In my job as a Chairman for Safety, Security and Environmental for the mechanic side, I was asked by Curtis to speak to this man. Each time I went over to the ramp, he was already out and about. So I decided to go into work early to speak to him. We talked and I walked over to the mechanic office next door when I was done. I was 3 min late. Manny was the TIC that day. I told him where I was and why. He was ok with it. Curtis never approached me with a problem with my attendance.

September 11, 2012: Tuesday: Coached on Job Performance, Filling O2 bottles. Again this was not the day. One day in September I approached Curtis, because there were no mechanics in the office and asked for his help. I had not filled an O2 bottle in about 6 months by myself, so I just wanted guidance as to the procedure. There are 3 lines, with handles and you had to turn them on in a specific order, to fill an O2 bottle for an aircraft. Curtis did not know how to fill a bottle, so he asked Craig (who just came back from a plane) to help me. So Craig helped me, we changed out one of the larger cylinders, because one was empty. Refilled the bottle I needed for an aircraft, and the job I asked for help with was completed.

November 7, 2012: Wednesday: Coached on attendance/conduct: Tardy and argued with leader when coached. Never late but the one time explained. Not sure what this was. (Documentation?)

Exhibit 3: Curtis met with Sandy on Feb 6, 2013. I explained about this seat issue. We had never had this problem before. I was the lone mechanic on a Korean Boeing 747. I went over to the other mechanic on the Korean Airbus 330 to ask him if he had any knowledge of how to fix this. He told me how, just to be very careful, when unscrewing the connecting cable, because I could break the cable when it was unsecured, if I wasn't. The male purser, head flight attendant was very close to me while trying to do this job and repeatedly was giving me advice on how to do the job. As an FAA licensed mechanic my job is not allowed to be interfered with. Yet Korean Airlines employees felt because I was a woman I was not able to perform my job. Other mechanics when working both Korean Airlines and Delta Airlines relied upon each other to complete many jobs that one mechanic had done before and the other was unfamiliar with. As a new mechanic only out of school since 2009, there were many jobs that didn't come up often that I was not trained on and unfamiliar with. This is part of the job. My lead and others told me it took a good 5 years for a mechanic to just get comfortable in their job, yet it would be a lifetime of learning in this career.

Regarding the food, never stated who supposedly caught me, also the when and what type of food. If I had been taking food off the aircraft for almost 2 years, why did anyone not take a picture of me during this time? Sandy mentions the caterer Dave. This was the caterer that I had approached only weeks before in January because Steve told me Sandy wrote an email to him stating I was asked 5 times to put a strap back up on a 747 door and I did not complete the task. I approached Dave the next time I worked the Korean contract and asked him why he lied about me? When I laid down on the diamond steel plate reaching from the caterers truck to the aircraft to push back up the red strap, my lead was on the ground and told me not to put the strap up, it was part of the emergency slide and had to stay out for the flight attendant to reach. I told both Dave and the caterer on the truck about this strap that they pointed out on that day in January. Now in this email he is writing something that is untrue. Dave told me he went to my lead after and my lead told him it should be put up. However, that was untrue also because I asked my lead and he said he would have told him what he told me. Dave was very indignant when I approached him and told him he lied. Yet, all the cleaners told me to do this when I told them what happened because he had been lying about certain cleaners for years. They told me they always put their

feet in the aisles to trip him because he lied so much about their fellow employees. They told me he was Korean and was a good friend with Sandy.

Allegation I was reading on the golf cart. I was told almost a year ago by Steve, before Sandy left, to not read in sight of the passengers. So I parked under the overhang or out by the fuel truck and fueler.

Sandy stated the other mechanics waited in the jet bridge. However, it was a Korean airlines policy that mechanics were not to be seen, especially by the passengers. This was a requirement on the contract. No mechanics were ever allowed to wait in the jet bridge. We waited on the ground and were contacted by radio if they needed us.

The day I was suspended Curtis asked me to get my thoughts together, however he never asked me to send him a written statement that was due that night about the occurrences. He asked me to write them down, which I did. He also told me during the meeting that this was the first time anyone from Korean Airlines had complained about me. The only food instance I was aware of with Customs and Border patrol and Korean Airlines was when an instructor from Delta asked me to show him the Korean Airlines Airbus 330 cockpit. When we arrived at the cockpit after Customs told us they were done, there was a meal sitting on the center console in the cockpit. We went about our business, but I heard the woman CBP officer tell one of the cleaners to get the meal out of the cockpit. That was all we were aware of, that happened. I was unaware of any further issues with Customs and Border patrol. The two purser instances I told truthfully what happened to both Jack LaPalm and Lisa Todd (whom was on the phone) on February 14, 2013. Curtis had left for vacation after suspending me, and Jack LaPalm had to come in from Portland, Oregon for the interview.

Exhibit 4: Steve Villacana

We had worked for 3 years together. I was senior to him on the seniority list. He along with 3 others were the ones hired from Swiss Port. I had written this in my letter to Tony Charaf, while still working in Atlanta, that there were 4 persons hired off the street, below my seniority for Delta maintenance in Honolulu. Steve was the one who was the Korean contract liaison between Delta and Korean

Airlines. He showed me how to work the contract, even though I had great misgivings about working on a contract that so many other Delta mechanics had issues with, didn't want to work and were taken off the contract. When asked to work Korean, from the beginning both Steve and Curtis were aware I did not want to work the contract. I worked the Korean contract starting in April 28, 2011 and was not sent to school in Atlanta for the 747 until February of 2012. I never was qualified on the Airbus 330.

Steve and I did not have a normal relationship in work. If Steve was TIC and needed any help with any of the Delta or Korean paperwork, to run and get a part or to help him literally with any of the numerous duties we were required to do, he asked me, because the other guys were busy playing games on the computer and he had a lot of work to do. Many times he would ask someone else and they would tell him "No". He was only a Technician in Charge, not a lead, so they didn't have to help him.

There are numerous inconsistencies in this question and answer, regarding the aircraft being cleared before entering it. I was never approached by anyone that told me I was going on before it was cleared. This is a clear violation of Customs and Border patrol regulations. Customs and Border patrol officers are in the jet bridge and then on the aircraft after the passengers de-board. When the aircraft arrives as a mechanic, I am on the ground, plugged into a headset just following the aircraft being chalked. I welcome the pilot and ask if he has any write ups. The pilots tell me what they are if any and I proceed to do my walk around, by myself of a Boeing 747. This includes checking engine oil and the cargo holds after they are emptied. Most of the time there is no one except the cleaners on the plane by the time I get done and head up to the cockpit. If this violation of Customs and Border patrol regulations was true why wasn't it reported to my manager sooner, by customs and border patrol? I went onto international flights that were with Delta Airlines, several times every day, if there was any type issue why wasn't I notified. Why is there no documentation?

In regards to the next paragraph. This is a lie. I worked with Steve, according to the records on my daily sheets a total of 26 times the past 6 months when Steve was on night shift.

I am out of the office taking care of the Korean aircraft on any given day for 4 to 5 hours. I have my own hydro flask and my own snacks. I bring vanilla granola and un-salted almonds from Down to Earth. These snacks are in my cargo pants pockets along with plenty of latex gloves. When I first started the Korean charter Steve was training me. He introduced me to many of the flight attendants. They always offered water and juice. Steve even told them to give me some of the special red tea, given only to the first class passengers. Steve was always friendly with the flight attendants. Never once did I state to anyone that it was alright to take international used food off the aircraft.

Never once did I take food or meals off the aircraft.

Never once did Don or Ron ever tell me not to take food off the aircraft.

It is part of the Custom and Border Patrol rules to never take food off an international flight. Never once did I tell Steve that they liked me here. He was well aware that the pursers had a hard time being below a female mechanic. I always did what I was asked to do, but knew from the beginning they had issues with a female mechanic. Sandy is called the Dragon Lady, by everyone that works the Korean contract. Cleaners, especially do not like her. She is very verbal and gets very angry when it takes them too long to do a job. I was very cautious around Sandy, she was not a happy person, and any little thing set her off on the cleaners.

Female flight attendants only spoke to the male mechanics if they could speak English. I never had once had an altercation with the pursers except for the two time I wrote about. Never! This is not clear, if I had an altercation every day, why was I not written up? Justin refused to give the Korean Captain his seat when he arrived in the cockpit, so one of the Delta leads was called up on the radio by Korean airlines and he had to come get Justin out of the seat. He was written up for this and taken off the contract. Why is there nothing in my file about these violations if every day for almost 2 years I had an altercation with the flight attendants and purser?

What do I do with the food? I eat it. Well if I ate the food, how did it get off the aircraft.

If I needed help on almost everything I did. Why was I continually put on an aircraft by myself? Delta was very aware that on their contract with Korean it stated that 2 mechanics were supposed to work each aircraft. However, Delta did not have enough mechanics to support this contract, and we were continually put on the contract with only 2 mechanics for 2 aircraft.

If Steve was aware of the complaints, and Curtis was aware of the complaints, why was I not aware? Why is there not one written document regarding any of these allegations?

Regarding work I refused, where again is the documentation. This is only Steve giving a narrative, where are the emails, documentation and write ups on my record if this has been happening for almost 2 years.

If I did not have the skills to work the line, why was I sent to Maui to work the two 757's all by myself for over a year? I worked the Maui contract from December 24, 2011 through February 2013. There were no instances in Maui.

After being suspended I spoke with Steve 3 times. He even met me in person. I was so very upset and did not have any idea what I did wrong. He told me neither did he. He was as confused as I was. He also told me if Delta offered me like \$300,000 dollars then just take it, because Honolulu was such a messed up station.

Exhibit 5A: Kim Don

Entering the aircraft without clearance. The Custom and Border patrol officers are on the aircraft until it is cleared. Why is there no paperwork from them? The last occurrence he states was 2 months ago. Why is he bringing it up now if there has been no occurrences since then? Why in Sandy's statement does she state the last time was 6 months ago? Where is the documentation that 6 months ago, Customs and Border patrol gave a warning to Korean airlines?

How actually did I get the food off the aircraft? I wear a shirt and pants. How would I physically get meals that are on plates, used by passengers off the aircraft.

How would I get help from other technicians when I am the only one on the aircraft? The only time I asked for help was with James and the bulkhead seats IFE screen. I had to go over to the 330 and ask him. I was never trained on the IFE screens. To fix these screens is tribal knowledge, passed on from one mechanic to another. No books or Boeing instruction sheets.

The meeting with Curtis was 6 days ago, not 2 weeks. The meeting was called about my attitude? Not the food or the reading?

Exhibit 5B: Kim Don

He states that he has seen me several times go into the aircraft without it being cleared. Yet on Exhibit 5A he stated it has been over 10 times and the last time was 2 months ago.

When did Korean Airlines, almost, get the fine? Was this 2 months ago or 6 months ago? (After getting this paperwork in June of 2014, I went to the Customs and Border patrol office at Honoulu Intl Airport and spoke to an officer about these allegations. This officer, John Mitavich who is the Passenger Service Manager, was not aware of any instances with Korean Airlines. I asked if he could please ask his superior. He went into the office and came back and told me the Captain was also not aware of any fines or issues with a mechanic coming on or taking food off the aircraft. He also told me that if they see someone taking food off the aircraft, they always pull them aside and give them a warning, explaining that the used food coming off an international aircraft is not allowed to be taken off and is against the law.

He states I refuse to do my job. What job did I refuse to do? If I had been refusing to do any job they asked me to do for almost two years, why is this only been brought to my attention now.

Exhibit 6: Sandy Naito (she portrayed herself to Jack LaPalm as the Station manager, I had to tell him that she was not. Mr. Harry was the manager. I did not know her title) Sandy has been taken off our flights at least twice since I worked the contract. This last time she was gone for several months. We were told it

was because of she had behaved unprofessionally and they put her in a position where she did not work with people.

She states that I was told only one time by her managers and that was two months ago. However in Kim Don's statement he said he brought it up to Sandy at least 10 times.

In this statement she never said how many times, only that it was 2 months ago.

She also does not recall who said my attitude was not good, and when did she witness my attitude not being good.

Numerous questions were not answered by Sandy.

Then she states that I do not have a good attitude, I get upset and has to call for help a lot. However she never gives one instance. She also never gives what work I refused to do. If this was so upsetting to Korean airlines that I have had a bad attitude for 2 years, why do they not know of specific instances?

Another two questions not answered.

Recap: Multiple complaints for some time. What complaints, only one, again the IFE in the bulkhead seat. We do not tolerate that sort of attitude, however it was their employees, both pursers one male and one female that yelled at me. One told me how to fix the problem, after I had gone to a Delta mechanic and asked. And the other time the female purser was yelling at me repeatedly that it was on my checklist to turn off the IFE on the 747. Which it was not and we were told not in any circumstances to re-boot the IFE if there was no write ups.

I was the only mechanic that cleaned the lav sinks of vomit. This occurrence was almost daily on the Korean Airbus 330. This was the cleaners job, but they were not familiar with the sink drain and how to take and clean it out. The drain cap had to be pulled out with needle nose pliers, you had to do this after taking out as much vomit as possible with the paper towels in the bathroom and put it into a plastic bag. I would try to clean out as much vomit as possible. Then you had to take the drain cap along with the screen underneath and bang it on a paper

towel. You could not have any chunks go down the sink because the drain hose is only so big and clogs easily, that is what the screen is to catch. This was the procedure Korean asked us to do. I know several of our mechanics absolutely refused to do this, one was Tim Donahue. Korean also expected us to take off seat cushions that passengers had an accident on, either urine or vomit, clean them off and let them either sit in the sun on the food truck ramp or if in a hurry take them down to the air conditioning discharge that was super hot and hold them up by the discharge until they dried. This is why I carried so many latex gloves in my pockets.

Attachment B.



Sue Wadas <suezw66@gmail.com>

Aloha from Sue Wadas

10 messages

Sue Wadas <suezw66@gmail.com>

Tue, Feb 11, 2014 at 10:19 AM

To: "tony.charaf@delta.com" <tony.charaf@delta.com>

Dear Tony,

We met over four years ago when you cared enough for one employee and her handicapped son. You cared enough to help her get a line position in Honolulu so her son could work with dolphins. I am praying that you care enough to help her one more time.

My name is Sue Wadas and even before I came to Honolulu I found myself involved in a station that did not want a woman working there. Before I arrived, in 767 school in Atlanta, one of the men, Tim Donohue, working in Honolulu told me point blank that I had caused a big commotion there because they had to build me a bathroom, so the office was a mess, and a good mechanic was losing his job because of me. I emailed Paul Fugere and explained that I did not want to cause problems. He wrote back and told me that none of what Tim said was true. What I did not know was that Paul told all the mechanics in Honolulu, during a meeting before I came, that women did not belong in line maintenance. This is the type of environment I arrived into in January of 2010.

I bet u are wondering what I want?

I want you to be aware of the the discrimination issues that are happening with women in maintenance; Delta wide. I want you to know that managers are turning a blind eye to bullying, lying and intimidation against women in maintenance. I did just what you asked me to do and never had a writeup and did everything they told me to do. I appreciated your advise.

Tony, I just wanted to thank you for this opportunity for my son, we now own a home here, and plan to keep helping our son achieve his dream.

Thank you so much for taking the time to read this letter.

Susan Wadas
1316 Mokapu Blvd
Kailua, HI 96734
808-254-1117
Sent from my iPad

Charaf, Tony <Tony.Charaf@delta.com>

Tue, Feb 11, 2014 at 10:54 AM

To: Sue Wadas <suezw66@gmail.com>

Dear Sue,

I am so happy to see that you and your son have a home and you will continue to help him achieve his dreams. May you remain blessed and successful on your journey.

I appreciate and respect your concerns regarding the discrimination issues you mentioned and I can assure you that our great company doesn't condone or allow any sort of discrimination...This is clear to me because I have served on the most senior diversity council for several years.

With that said, you need to know I am no longer at TechOps and for the last year and a half I have been

serving the Cargo people. With your permission I am willing to forward your email to the right people at TechOps.

Please let me know your preference.

tc

[Quoted text hidden]

Sue Wadas <suezw66@gmail.com>

To: "Charaf, Tony" <Tony.Charaf@delta.com>

Wed, Feb 12, 2014 at 8:56 AM

Dear Tony,

Thank you so much. It was wonderful to hear your words. I would be grateful if you forwarded my message over to tech ops. I would just appreciate having my day before the Tech Ops council.

Have a blessed day yourself.

Sincerely,

Sue

Sent from my iPad

[Quoted text hidden]

Charaf, Tony <Tony.Charaf@delta.com>

To: Sue Wadas <suezw66@gmail.com>

Wed, Feb 12, 2014 at 9:41 AM

Hi Sue,

Being that your concerns are due to discrimination,

I recommend I share your email with the Director of Human Resources at TechOps. Do you agree? tc

Sent from my iPhone

[Quoted text hidden]

Sue Wadas <suezw66@gmail.com>

To: "Charaf, Tony" <Tony.Charaf@delta.com>

Wed, Feb 12, 2014 at 10:02 AM

Dear Tony,

Human resources has already been advised. I have no paperwork concerning my termination and was fired over the phone. Curtis Carter who terminated me was also terminated two weeks later.

I sent 44 pages of documentation in March of 2013 to Tech Ops council and was was advised in April that there was two termination cases before me, yet have not heard anything since. I have also sent a letter to Richard and have not heard back from him yet.

Tony, you are the only one who has responded to me. If there is any chance that you can look into this further, I would greatly appreciate it.

Sincerely,

Sue

Sent from my iPad

[Quoted text hidden]

Charaf, Tony <Tony.Charaf@delta.com>

To: Sue Wadas <suezw66@gmail.com>

Wed, Feb 12, 2014 at 10:05 AM

I will check with the TechOps council...Based on my knowledge with the council they will review your case fairly. tc

-----Original Message-----

From: Sue Wadas [mailto:suezw66@gmail.com]

Sent: Wednesday, February 12, 2014 3:02 PM

To: Charaf, Tony

[Quoted text hidden]

Sue Wadas <suezw66@gmail.com>

To: "Charaf, Tony" <Tony.Charaf@delta.com>

Wed, Feb 12, 2014 at 7:02 PM

Thank you so much Tony

Sent from my iPad

[Quoted text hidden]

Sue Wadas <suezw66@gmail.com>

To: "Charaf, Tony" <Tony.Charaf@delta.com>

Mon, Feb 17, 2014 at 3:26 PM

Dear Tony,

I received a call from Ed Brown this morning. I can't tell you how much this means to our family. I love working for Delta and would like to know why I was fired.

Thank you,

Sue

Sent from my iPad

[Quoted text hidden]

Charaf, Tony <Tony.Charaf@delta.com>

To: Sue Wadas <suezw66@gmail.com>

Mon, Feb 17, 2014 at 3:33 PM

Ed is a good man. All the best.

tc

Sent from my iPhone

[Quoted text hidden]

Sue Wadas <suezw66@gmail.com>

To: "Charaf, Tony" <Tony.Charaf@delta.com>

Fri, Feb 21, 2014 at 11:55 AM

Tony,

Thank you.

Sue

Sent from my iPad

[Quoted text hidden]

S. Wadas

1316 Makapu Blvd
Kailua, HI 96734

CIV. No. 18-00312 LEK-KJM

Reconsideration

USDC JAN 11 '24 3:24PM

Honorable Judge Leslie Kobayashi

USDC JAN 11 '24 3:24PM